



New York
White Plains Plaza
One North Broadway
White Plains, NY 10601-2310
914-997-0500 Telephone
914-997-0035 Fax
www.lowey.com

Pennsylvania
Four Tower Bridge
200 Barr Harbor Drive, Suite 400
West Conshohoken, PA 19428-2977
610-941-2760 Telephone
610-862-9777 Fax

May 1, 2015

VIA ECF

The Honorable George B. Daniels
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

VIA FACSIMILE (212-805-6111)

The Honorable Henry B. Pitman
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Laydon v. Mizuho Bank, Ltd., et al., No. 12-cv-3419 (GBD) (HBP)

Dear Judges Daniels and Pitman:

As counsel for Plaintiff, we write to request a conference to address Defendants' outstanding objections to Plaintiff's First Request for the Production of Documents served on June 18, 2014.

At the April 7, 2015 conference, this Court set May 15 as the "target date" to begin document discovery. *See Apr. 7, 2015 Tr. at 8:5-10 ("[o]bviously your target date with regard to discovery as we move forward, and if you want to start discussing it now, that's appropriate, but be able to move forward after May 15, consistent with what the government's position is.").*

The next day, this Court ordered that "[d]ocument discovery shall commence on May 15, 2015." ECF No. 451.

As a result of the April 8 Order, we emailed defense counsel requesting "the manner, form, and expected size of the document production" each defendant intended to produce to us on May 15.

Liaison counsel e-mailed us back this morning stating that "[i]t is clear to us that Judge Daniels is not expecting, and he has not ordered, the parties to produce documents on May 15th." In their view, "[t]he May 15th date merely marks the end of the discovery stay that was put in place in response to the DOJ's motion to stay discovery." *See Exhibit A (attaching e-mail correspondence).*

A conference is necessary to resolve Defendants' objections so that document discovery can commence on May 15, 2015. Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Geoffrey Horn".

Geoffrey Horn

cc: Counsel of Record (via ECF)